Exhibit A

Gmail

Sarah Cohen <sarah@tomorrowlaw.com>

Thoma v. VXN et al. - Meet and Confer on the Original Action and the PAGA Action

Eric Clopper <eclopper@kanelaw.la>   Fri, Sep 1, 2023 at 4:37 PM
To: Sarah Cohen <sarah@tomorrowlaw.com>, "david@tomorrowlaw.com" <david@tomorrowlaw.com>,
"jeff@tomorrowlaw.com" <jeff@tomorrowlaw.com>
Cc: Brad Kane <bkane@kanelaw.la>, Chris Cude <ccude@kanelaw.la>

Sarah,

We would like to meet and confer on the three separate actions: (1) the federal class action; (2) the state PAGA action; and (3) the recently remanded state UCL action.

First, please let us know what days and times you are available of Monday through Wednesday of next week, September 7–9, 2023, to discuss whether your client would agree to either (i) consolidation of the state court actions; (ii) a stay of the state court actions; and/or (iii) a demurrer based on a plea of abatement in the two separate state actions.

Second, in light of the Court's ruling on the Motion to Dismiss, let's see if we can have a meaningful meet and confer about your First Amended Complaint in the federal action *before* it is filed. Please let us know when you have a draft First Amended Complaint for us to meet and confer on so our clients do not have to litigate unnecessary issues with a Second 12(b) Motion.

Best,

Eric Clopper

Senior Associate

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